

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division  
ERIC J. HAMILTON  
Deputy Assistant Attorney General  
JOSEPH E. BORSON  
Assistant Branch Director  
KATHRYN BARRAGAN (D.C. Bar No. 90026294)  
Trial Attorney, U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W.  
Washington, D.C. 20005  
Tel.: (202) 598-7696  
Email: kathryn.e.barragan@usdoj.gov  
JASON ALTABET (Md. Bar No. 2211280012)  
Trial Attorney, U.S. Department of Justice  
Tel.: (202) 305-0727  
Email: Jason.k.altabet2@usdoj.gov

*Attorneys for United States*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

NEETA THAKUR, <i>et al.</i> ,	)	Case No. 25-cv-4737-RFL
Plaintiffs,	)	
v.	)	<b>DECLARATION OF HOWARD DICKENSON</b>
	)	<b>IN SUPPORT OF FEDERAL DEFENDANTS'</b>
	)	<b>OPPOSITION TO PLAINTIFFS' MOTION TO</b>
DONALD J. TRUMP, in his official capacity as	)	<b>AMEND AND MOTION FOR A PRELIMINARY</b>
President of the United States, <i>et al.</i> ,	)	<b>INJUNCTION AND CLASS CERTIFICATION</b>
	)	<b>AS TO DOE</b>
Defendants.	)	Judge: Hon. Rita F. Lin

I, Howard Dickenson, pursuant to 28 U.S.C. § 1746, and based upon my personal knowledge and information known to me from official records reasonably relied upon by me in the course of my employment, hereby declare as follows relating to the above titled matter. Records attached to this declaration are true and accurate copies of records maintained in the ordinary course of business.

1           1.       I am the Acting Deputy Director for the Office of Clean Energy Demonstrations (“OCED”)  
2 within the Department of Energy (“DOE”). In this position, I serve as the highest-ranking civil servant in  
3 the OCED organization responsible for all facets of OCED operations. I have personal knowledge of the  
4 matters set forth below, except those matters that are based on information conveyed to me in my official  
5 capacity, which I believe to be true, and could and would testify competently to them if called to do so. I  
6 make this declaration in support of the Federal Defendants’ memorandum in opposition, filed concurrently  
7 herewith.

8           2.       Plaintiffs have challenged the termination of the California Hydrogen Hub Grant to the  
9 Alliance for Renewable Clean Energy Systems (“ARCHES”). The California Hydrogen Hub grant was  
10 awarded by, and is currently administered by, OCED. OCED issued this award as a demonstration project,  
11 and not as a research and development (“R&D”) project. This was reflected in, among other items, the  
12 President’s Fiscal Year 2024 Congressional Budget Request that the Department of Energy submitted to  
13 Congress in coordination with the Office of Management and Budget (“OMB”). OMB approved the  
14 Budget Request, including approving the identification of the OCED Hydrogen Hub program as a  
15 demonstration project rather than R&D project. A true and correct copy of OCED’s publicly available  
16 Fiscal Year 2024 Congressional Budget Request is attached as **Exhibit A**.

17           3.       The California Hydrogen Hub grant was established through a cost-sharing cooperative  
18 agreement between OCED and ARCHES. Under the agreement, the federal award totaled \$1.2 billion,  
19 while ARCHES committed to covering \$11.4 billion—over 90%—of the total project cost of \$12.6 billion.

20           4.       Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
21 and correct. Executed on December 8, 2025.

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23  
24                               /s/

25                               Howard Dickenson  
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